

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Dana L. Haynes,

Debtor.

Case No. 18-14980-pmm

Chapter 13

Objection to ECF No. 105

Debtor's Objection to Motion to Dismiss

Debtor Dana L. Haynes, by her attorney, hereby objects to the Motion to Dismiss filed by chapter 13 standing Trustee Kenneth E. West. The Court must deny the Motion for the following reasons:

1. On Friday, April 19, 2024, the Debtor sent a certified check payable to the Trustee in the amount of \$2,460.00 via overnight mail, which cured the arrearage that gave rise to the Motion.

If this case is dismissed notwithstanding the Debtor's objection, the Debtor requests that the Court retain jurisdiction over plan payments consistent with *In re Sherman*.

Date: April 22, 2024

CIBIK LAW, P.C.

Attorney for Debtors

By: 

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Certificate of Service

I certify under penalty of perjury that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 22, 2024



Michael I. Assad